

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FIFTH DIVISION

Matthew J. Campanella,

Court File No. 19-cv-171

Plaintiff,

vs.

COMPLAINT

Thomas Anderson,

Defendant.

COMES NOW the Plaintiff, who for his cause of action against Defendant herein, states and alleges:

1. At all times material and relevant herein, Plaintiff has been and remains a resident of Douglas County, Wisconsin. Defendant has been and remains a resident of Bemidji, Minnesota within the Fifth Division of the United States Judicial District of Minnesota. The amount in controversy herein, exclusive of costs and disbursements, exceeds \$75,000. Jurisdiction is founded on the provisions of Title 28, U.S.C., Sec. 1332.

2. On August 1st, 2017, Plaintiff rented a residence from Defendant that contained toxic levels of chicken feces. Defendant carelessly and negligently failed to properly clean and maintain the residence being rented to Plaintiff.

3. As a direct and proximate result of that carelessness and negligence, Plaintiff contracted histoplasmosis, which illness totally disabled him for several months, causing him loss of income in the amount of at least \$20,000, medical expense in the amount of at least \$75,000, together with pain, suffering and loss of quality of life, all to his damage.

WHEREFORE, Plaintiff prays judgment be entered in his favor and against Defendant for a reasonable sum of money in excess of \$75,000 plus costs, disbursements, and other relief as may be deemed appropriate by the court.

FALSANI, BALMER, PETERSON & BALMER

DATE: 1/23/19

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